

January 31, 2006

EPA Comments on the Memorandum of Remedial Action Objectives (RAO Memo) for the West Lake Landfill OU 2 (dated January 19, 2006)

The following comments are intended to supplement the RAO Memo in providing direction for the Feasibility Study Report (FS):

General:

1. We anticipate that most of the substantive Missouri Solid Waste Regulations for final cover, monitoring and post-closure care (10 CSR 80-3) will be relevant and appropriate to the Inactive Landfill. The FS should be used to cite and describe these requirements and identify any anticipated variances.
2. The FS should include a “hot spot” analysis. We have seen no evidence of hot spots but it would be appropriate to go through the analysis provided in the presumptive remedy guidance.
3. The FS will need to describe the use restrictions necessary to maintain the protectiveness and the integrity of the landfill cover system(s). Also, the FS should provide some analysis of the available institutional controls that could be used to implement the use restrictions.

Specific:

1. Active Sanitary Landfill, pg. 2 – Append the Closure and Post-Closure Plan to the FS.
2. Active Sanitary Landfill, pg. 3 – Describe any expectations for how long leachate collection and treatment must be maintained.
3. Demolition Landfill, pg. 4 -5 – Cite and describe the State of Missouri requirements for the Closed Demolition Landfill. Append any post-closure plans.
4. Inactive Landfill, Cover Evaluation, pg. 6 – Grading and sloping requirements will also need to be considered.
5. Inactive Landfill, Leachate and Groundwater Characterization, pg. 7, 2nd paragraph – Here, and elsewhere this wording may appear, localized impacts to groundwater will be addressed by containing the source, rather than by “eliminating” the source.

6. Inactive Landfill, Leachate and Groundwater Characterization, pg. 7, 3rd paragraph – It is anticipated that the solid waste landfill groundwater monitoring requirements will be relevant and appropriate. These should be cited and described.

7. Inactive Landfill, Landfill Gas Characterization, pg. 7-8 – It is anticipated that the solid waste landfill gas control requirements, i.e., monitor and control if necessary, will be relevant and appropriate. These should be cited and described. The FS should also look at air regulations for existing municipal solid waste landfills.